



**LEVIN • PAPANTONIO  
THOMAS • MITCHELL  
RAFFERTY & PROCTOR • P.A.**  
PROFESSIONAL CORPORATION ATTORNEYS AT LAW

KIMBERLY LAMBERT ADAMS  
BRIAN H. BARR  
MICHAEL C. BIXBY  
M. ROBERT BLANCHARD  
BRANDON L. BOGLE  
W. TROY BOUK  
WESLEY A. BOWDEN  
VIRGINIA M. BUCHANAN  
WILLIAM F. CASH III  
JEFF GADDY  
REBECCA D. GILLILAND  
(LICENSED ONLY IN ALABAMA)

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FREDRIC G. LEVIN  
MARTIN H. LEVIN  
ROBERT M. LOEHR  
STEPHEN A. LUONGO  
M. JUSTIN LUSKO  
NEIL E. McWILLIAMS, JR.  
CLAY MITCHELL  
PETER J. MOUGEY  
DANIEL A. NIGH  
TIMOTHY M. O'BRIEN

MIKE PAPANTONIO  
CHRISTOPHER G. PAULOS  
EMMIE J. PAULOS  
A. RENEE PRESTON  
ROBERT E. PRICE  
MARK J. PROCTOR  
TROY A. RAFFERTY  
MATTHEW D. SCHULTZ  
W. CAMERON STEPHENSON  
THOMAS A. TAYLOR  
LEO A. THOMAS  
BRETT VIGODSKY



(LICENSED IN WASHINGTON, D.C.  
AND MARYLAND)

LEFFERTS L. MABIE, JR. (1925-1996)  
D.L. MIDDLEBROOKS (1926-1997)  
DAVID H. LEVIN (1928-2002)  
STANLEY B. LEVIN (1938-2009)

June 13, 2018

**VIA REGULAR MAIL AND EMAIL**

Benjamin W. Hulse  
Blackwell Burke P.A.  
431 South Seventh Street  
Suite 2500  
Minneapolis, MN 55415  
bhulse@blackwellburke.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Michael Dixon v. 3M Company*, Case No. 0:18-cv-00240-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/ec  
Enclosure

Response to Deficiencies

*Michael Dixon v. 3M Company*, Case No. 0:18-cv-00240-JNE-FLN

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**Section III. #1.**      **This question has already been answered via the Acorn PFS portal. In the spirit of cooperating, Plaintiff asserts the following: Yes; Surgical Care Improvement Project Data reports indicate that a Bair Hugger warming unit was utilized during my surgery which caused infection; I do not recall but reserve my right to refresh my memory; Reviewing medical documents of my surgeries; Unknown at this time, Discovery is ongoing; Unknown at this time, Discovery is ongoing.**

**Reverification Page**

Pursuant to cure the defendant's deficiency and abide by Pre Trial Order 14, I declare that the given response(s) are true.

**REVERIFICATION**

Michael Roy Dixon  
Print Name

Michael Roy Dixon  
Signature

June 6 2018  
Date